

1 have been the subject of any note executed by Trinity
2 Broadcasting of New York?

3 A I don't believe it would have.

4 Q Now, in terms of interest, would I also be correct
5 that there would have been no interest charged relative to any
6 money lent to Trinity Broadcasting of New York from Trinity
7 Broadcasting Network?

8 A That's correct.

9 Q Mass Media Exhibit 45.

10 JUDGE CHACHKIN: We, we are on 45, aren't we?

11 MR. SHOOK: I, I had thought that the Minutes of the
12 Special Meeting of Trinity Broadcasting Network, Inc., for
13 December 21, 1981, was No. 44.

14 JUDGE CHACHKIN: But we just reviewed 45. I -- 44
15 is the Minutes of the Special Meeting. Oh, you said 45. You
16 meant 44, I guess.

17 MR. SHOOK: Oh. I'm sorry.

18 JUDGE CHACHKIN: All right.

19 MR. SHOOK: Okay. All right. Have I confused
20 everybody?

21 JUDGE CHACHKIN: No. No, we're, we're with you.

22 BY MR. SHOOK:

23 Q All right. Now, what I'd like you to focus on is
24 the Praise the Lord Newsletter for January 1982, and I have
25 that as Mass Media Exhibit 45. Do you see that?

1 A Yes, sir.

2 Q Again, the list of stations at the top are the owned
3 and operated stations.

4 A Yes.

5 Q Now, this is referencing the possibility of taking
6 up a station in New York, and I'd like you to look at the very
7 last -- the second to the last line on the page, where it
8 speaks to a potential of 16,000,000 new souls every night. Do
9 you see that?

10 A Yes, sir.

11 Q Now, can you tell me where that information came
12 from that the station in New York has got a potential to reach
13 16,000,000 people?

14 A Yes. The, the owners of the station that we pur-
15 chased it from represented to us as a part of our negotiations
16 for the purchase of the station that this was a, a New York
17 station, albeit Poughkeepsie is about, I think, 40 miles to
18 the north of the heart of New York City, and that up and down
19 the Hudson River Valley and into the areas of, of New York and
20 even beyond, that there were indeed 16,000,000 population
21 under the realistic coverage of the station, and they present-
22 ed exhibits to me. I, I remember quite clearly a letter from
23 the then Governor of New York up in Albany. In fact, it had
24 been framed and hung on the wall, where the Governor had
25 picked up the signal clear up in Albany, nearly 90 miles away,

1 congratulating the owners on their sign-on of the station.

2 There were exhibits and letters shown to us shown from way up
3 in Connecticut, down in New Jersey, clear to -- down into the
4 southern parts of New York, Staten Island. We, we accepted on
5 good faith the fact that there were 16,000,000 population at
6 least within the reach of Channel 54.

7 Q Did you come to discover at some later point in time
8 that that reach wasn't perhaps quite as great as been -- had
9 been represented?

10 A I still believe that figure to be essentially true.
11 And, in fact, many years later, after operating the station,
12 we also continue to get letters and calls and communication
13 from areas even beyond New York City.

14 Q And I'd like you to focus your attention on the
15 second page, the second to the last paragraph above where it
16 is signed "By Paul." And I take it Paul is you?

17 A Yes.

18 Q Now, the sentence that I want you to look at is the
19 second sentence of the paragraph that I directed you to, and
20 the sentence reads, "This would be station number six. Only
21 one more to go..." Do you see that?

22 A Yes.

23 Q Now, I, I take it you had been in communication with
24 your attorneys at some point as to what the maximum number of
25 stations that could be owned by Trinity was?

1 A It, it was well-known to me that seven was the
2 permissible number of full-power stations at this time.

3 Q Now, I'd like you to direct your attention to Mass
4 Media Exhibits 47 and 48. You can just scan those documents.
5 I'm not going to be asking questions about the substance
6 necessarily, but if I do I'll point you to a particular
7 paragraph.

8 A Yes, sir. I see that these are the Annual Minutes
9 of the Board of Directors of Translator TV, Inc., and the
10 Annual Board Meeting of the Board of Directors of Trinity
11 Broadcasting of Florida, Inc.

12 Q Can you tell me how it came about that separate
13 Minutes were prepared but that basically the information in
14 the Minutes was virtually identical?

15 MR. TOPEL: Your Honor, I believe the documents will
16 speak for themselves as to how identical they are or -- virtu-
17 ally, virtually identical.

18 JUDGE CHACHKIN: Well, the witness can agree -- just
19 agree with the question. It's cross-examination.

20 DR. CROUCH: I'm sorry, Mr. Shook. Would you re-
21 state the question, please?

22 BY MR. SHOOK:

23 Q Okay. Can you give me some explanation as to why we
24 have separate Minutes or Minutes of Translator TV, Inc., and
25 Minutes of Trinity Broadcasting of Florida that are virtually

1 identical, how that came about?

2 A Well, I believe, the best of my recollection is that
3 the meetings were held concurrently and a lot of the action
4 necessary here was similar, if not identical, the reconfirma-
5 tion of all Directors for their next term of office, the
6 distribution of a booklet that I had written, the scripture
7 reading and the prayer and report of the President concerning
8 four broadcast stations are operating, et cetera, et cetera.
9 A little bit of news in here that related to, I presume, both
10 corporations. It'll take me a minute to see what the distinct
11 differences are. You, you stipulate that these are not iden-
12 tical, do you not?

13 Q Oh, yes. And for purposes of my question, it's not
14 necessary to, you know, focus on the difference. What I'd
15 like to ask you about, though, is that now the bottom of the
16 first page of the Translator TV, Inc., Minutes and also the
17 bottom of the first page of the Florida Minutes, there's a
18 reference to a, a John Casoria.

19 A Yes.

20 Q Although in the one case, in the Translator TV case,
21 his name is misspelled, but I presume it's the same indivi-
22 dual?

23 A Yes, it is.

24 Q Now, at this time Mr. Casoria is the Financial
25 Director or Comptroller of the Network?

1 A Yes.

2 Q Now, how, how long did he hold that position?

3 A A few years. I, I really don't recall how many,
4 three or four years, I believe.

5 Q Now, is he still physically located in southern
6 California?

7 A No, sir.

8 Q Where is he now?

9 A He resides in the Atlanta, Georgia, area.

10 Q How long ago did he move there?

11 A Approximately two to three years ago.

12 Q Is this the same individual who for a time was a
13 pastor of the Trinity Christian Center of Santa Anna, or is
14 that some other Casoria?

15 A He left his position as Financial Director at
16 Trinity and moved to become the pastor of Trinity Christian
17 Center of San Marcos --

18 Q San Marcos.

19 A -- down in, in San Marcos, California.

20 Q And then from there to the Atlanta area?

21 A Atlanta, yes.

22 Q Now, did he also have some connection with Community
23 Educational Television?

24 A Yes. He was for a time, I, I believe, the President
25 of Community Educational Television.

1 Q While Mr. Casoria was President of Community
2 Educational Television, was he also connected with Trinity in
3 some fashion?

4 A He may have been the pastor at Trinity Christian
5 Center, San Marcos, which is a Trinity affiliated corporation,
6 but it is a church, a full-blown church as opposed to a tele-
7 vision ministry.

8 Q I'd like you to turn to Mass Media Exhibit 49. Now,
9 at the top there is the list of stations again?

10 A Yes, sir.

11 Q Owned and operated?

12 A Yes.

13 Q Now, I notice that these are April/May 1982. This
14 is the Praise the Lord Newsletter for that period. And look-
15 ing back at Mass Media Exhibit 45, which is the January 1982
16 newsletter, I notice that in April/May we have something new
17 here. It looks like there is a reference to K57BT, Channel
18 57, Colorado?

19 A Yes, sir. This was a, a low-power or -- actually,
20 the term medium-power is I think one of our own making. We
21 sort of distinguish a 100-watt translator station from a
22 1,000-watt translator station by calling the 100-watt
23 low-power and the 1,000-watt medium-power, just -- it's an
24 internal thing that we kind of created. Channel 57 in Denver
25 is classified by the Agency as a low-power station and it

1 | apparently, in this meantime, has, has come on-line.

2 | Q Very good. Now --

3 | A Let me just say something about that, sir. K57BT is
4 | unique in that Denver is a fairly major market and the cover-
5 | age of Channel 57 was so superb, superb that the, the viewers
6 | up there actually helped us sponsor and build a, a full-blown
7 | television studio for that low-power station, which is rather
8 | unique, and I pres-- that is the reason that we have now added
9 | it here, because it now has a studio loca-- or is going to
10 | have a studio location. And the real purpose of these head-
11 | ings was primarily to give an address so that viewers in the
12 | areas could go and visit their, their studio locations at
13 | their stations.

14 | Q But this Denver station is somewhat unique in terms
15 | of although it's a low-power station technically, this is a
16 | station that was going to originate programming?

17 | A Yes.

18 | Q Had its own studio --

19 | A Yes.

20 | Q -- for that purpose? Or, at least, it will have had
21 | at some point. We may not have reached it yet.

22 | A Exactly.

23 | Q Now, I'd like you to turn to page 13 of the Exhibit.

24 | A Yes.

25 | Q All right. And what follows apparently are going to

1 be the projects that will be specifically solicited for in the
2 upcoming telethon?

3 A Yes, sir.

4 Q I'd now like you to turn to page 18.

5 A Yes, sir.

6 Q In the left-hand column, the fourth item.

7 A Yes.

8 Q Now, do you have any recollection of having reviewed
9 this newsletter prior to the time it went out?

10 A I have to stipulate, Mr. Shook, that I probably did,
11 but I don't have that independent recollection.

12 Q But it would have been your practice to have so
13 reviewed it?

14 A Yes, sir.

15 Q All right. If you could turn back to page 17? The
16 right-hand side, the fourth entry.

17 A Yes, sir.

18 Q Now, if memory serves, we had seen a reference to
19 "Felicidad" in the prior autumn. The write-up, though, was a
20 little bit different. You see that, don't you?

21 A Yes, sir, I do.

22 Q Now, did you have any role in the caption that
23 appears here?

24 A As I told you earlier, I did not write the captions,
25 nor was I the author of this particular caption.

1 Q But it would have been likely that you would have
2 reviewed this?

3 A I, I certainly may have and probably did.

4 Q Now, looking at the second sentence, that reads,
5 "David is a Board member of our Satellite Division..." "our
6 Satellite Division" is Translator TV, Inc., isn't it?

7 A I believe it certainly is in this case.

8 Q Moving on to Mass Media Exhibit --

9 A May I just say one final thing, Mr. Shook?
10 Satellite Division, as I review this now, is probably an
11 inappropriate term, but I, I think in the minds of some of the
12 staff members and perhaps even in my own mind back in 1982,
13 Satellite Affiliate may have been synonymous terms. As I see
14 it now and in the context of our proceedings here, I see that
15 that is certainly an inappropriate characterization of, of
16 Reverend Espinoza's role. The fact that he is characterized
17 in perhaps an inappropriate way here does not alter the fact
18 that he was indeed a full-fledged Board member of a very sep-
19 arate corporation and, as I said, the nomenclature here may
20 not be correct, but I, I still feel that that does not alter
21 the, the facts.

22 Q I'd like you to turn to Mass Media Exhibit 50.

23 A Yes, sir. I'm there.

24 Q Now, there are references to Translator TV, Inc.,
25 that appear on pages 19 and 21, and the reference on page 19

1 | apparently is a continuation of information that begins on
2 | page 18, whereas the information on page 21 is a continuation
3 | of information that begins on page 20, just to help you focus
4 | on what's here.

5 | A Yes. I see that.

6 | Q Now, would I be correct that Translator TV, Inc.,
7 | was made a part of the financial statement because of the
8 | commonality of the Board memberships that existed among the
9 | various companies that are listed here?

10 | A That, as I've searched my memory on this issue, Mr.
11 | Shook, is, is certainly one answer.

12 | Q Is there any other?

13 | A Sir?

14 | Q Is there any other?

15 | A This was a decision, not of mine but of the auditing
16 | firm of Trinity Broadcasting and its affiliated companies. In
17 | retrospect, I can see now that it probably should have been
18 | completely broken out as a separate financial statement and
19 | audit, but I have to reflect that it is a separate line item.
20 | The information on the actual books of the corporation were
21 | always kept completely separate. This was simply, I guess, a
22 | convenient way of incorporating an affiliated entity into the
23 | overall financial picture. And please remember too, this is a
24 | pretty early date as well. This is 1981, December 31st.
25 | Please remember that Translator TV, Inc., was a very new

1 fledgling little corporation, that none of us really knew the
2 direction that it would finally take or, or end up with. So,
3 if I could go back to 1981, I think I would probably direct
4 our auditors to break that out a little more separately. But
5 there you have it. It's, it's done.

6 Q Looking at the income figure for Translator TV,
7 Inc., which I guess it's under the heading of "Revenue" and it
8 appears on page 21, I think we're all pretty clear that the
9 figure there is the income that came in during 1980?

10 A Yes, sir.

11 Q Now, the, the problem I have with that, and perhaps
12 you could help me with it, is that we know from Mass Media
13 Exhibit 43, which was the October '91 Praise the Lord
14 Newsletter, on page 6 I -- did I say '91? Excuse me. October
15 of '81 newsletter. That there were -- that there was a solic-
16 itation for low-power broadcast stations. Now, do you have
17 any explanation as to why apparently there was absolutely no
18 income for 1981 when solicitations were made both in the
19 October 1981 newsletter as well as the November 1981 Praise-a-
20 thon?

21 A I, I believe I, I have the answer to that. I ex-
22 plained earlier that even though funds may be raised during
23 the telethon for specific projects, unfortunately, the donors
24 do not always, in fact, quite, quite rarely indicate in their
25 letter or correspondence or on their check exactly what that

1 gift is pledged for. So, in the absence of that information,
2 as I said earlier, it simply has to be placed in the TBN
3 General Fund.

4 Q With placement in the TBN General Fund, would TBN
5 then have taken some steps to allocate that money among the
6 various special projects for which solicitations were made?

7 A Absolutely.

8 Q If that were the case, wouldn't it have been likely,
9 then, or shouldn't it have, shouldn't it have occurred that
10 money would have been then allocated to Translator TV, Inc.?

11 A Had there been some activity and some expenses
12 generated, that would have been done. But apparently since
13 that was not the case, it wasn't.

14 Q Well, sir, in, in that case, I would have to refer
15 you back to -- I would have to refer you to Mass Media Exhibit
16 50, pages 20 and 21. And according to this information, which
17 in fairness to you we know now to be inaccurate, but there are
18 expense figures noted for Translator TV, Inc.

19 A Yes. A total figure of \$65,853.

20 Q Well, which happens to be more than double, you
21 know, what the revenue figure is.

22 A Yes.

23 Q Again, can you give me some explanation as to how
24 this could have occurred, that we have expenses being piled up
25 for this corporation but somehow the income isn't there?

1 A All I can say is I can, I can promise you the bills
2 got paid, if those were indeed Translator TBI -- TV's ex-
3 penses, that they got paid for, albeit probably by Trinity
4 Broadcasting. But I know, and I don't know if we're there
5 yet, but there was a period in time when expenses that were
6 truly not attributable to TTI got allocated to TTI, and I'm
7 not sure we're there yet.

8 Q Now, we're not. As I said, in fairness to you, that
9 I recognize that there were some mistakes made here and we
10 have a stipulation to that effect. But what I'm focusing on
11 is your knowledge at this period of time, and you had given an
12 explanation that income wasn't going to be allocated to
13 Translator TV, Inc., because of its inactivity, and what we
14 have here is a document that reflects activity to the extent
15 that expenses are being incurred.

16 A Well, sir, all I can say is that apparently \$31,033
17 was all that was actually received and able to be identified
18 for TTI. Apparently, \$65,853 got spent. So, somebody made up
19 the difference, and I can assure you that it was Trinity
20 Broadcasting that did that.

21 Q Now, in the course of reviewing this Financial
22 Statement, do you have any recollection of any discussion
23 among the members of the Board of Translator TV, Inc., as to
24 what is happening with that company in terms of its income and
25 expenses?

1 A I have no memory back to 1981 as to any specific
2 discussion with the Board. It is my belief and my understand-
3 ing that the Financial Statements were made available to all
4 Board members, including TTI, so that information certainly
5 was known to all Board members. But I have no independent
6 recollection of any specific discussion with them about it.

7 Q I'd like to move on to Mass Media Exhibit 53.

8 A Yes, sir. I'm there.

9 Q Now, what I have reflects that it's for October/
10 November, but the year got cut off. So, we're going to have
11 to go through this and see if I have the right year. It's my
12 understanding that the year in question is 1982, but we'll
13 see. First of all, in terms of the list of stations on page
14 1, these are the owned and operated stations, correct?

15 A Yes, sir.

16 Q Now, if we turn to the next page, apparently we have
17 the first help here in terms of the year, because it makes
18 reference to a satellite Middle East briefing tour to take
19 place in November and December of 1982.

20 A Yes.

21 Q So, it would make sense to you, would it not, that
22 this is the 1982 October/November newsletter?

23 A Yes, I, I'm, I'm sure that's true.

24 Q Also turning to page 9, we have reference to Praise-
25 a-thon '82 projects.

1 A Yes.

2 Q And if you would, turn to page 12, the left-hand
3 column, second entry.

4 A Yes, sir.

5 Q That these are additional solicitations for low-
6 power stations.

7 A Yes, sir.

8 Q Which would include Translator TV, Inc., stations?

9 A I believe it would.

10 Q In all likelihood, you reviewed this document before
11 it went out?

12 A I -- in all likelihood I did, yes, sir.

13 Q In all likelihood, solicitation for low-power sta-
14 tions was actually made during the telethon?

15 A Yes, sir.

16 Q Turning back to page 11, right-hand column, second
17 entry.

18 A Yes, sir.

19 Q Now, this is the exact same reference made to
20 Reverend Espinoza that had been made in the newsletter of six
21 months previous. Do you see that?

22 A Yes, sir.

23 Q Any recollection in -- of reviewing this matter
24 before it went out?

25 A No independent recollection. And, Mr. Shook, it's

1 beginning to look to me like the staff was just virtually
2 copying the, the previous newsletter's captions, which cer-
3 tainly was a mistake. Not so much so for Pastor Espinoza, but
4 for these low-power stations. It -- as I review it now, it
5 would seem to me that that list of stations would change, as
6 the --

7 Q Okay. Are you making reference to the listing that
8 appears on page 12, the cities that are noted there?

9 A Yes, sir. It appears to be the same cities as in
10 the previous newsletter, which is a little strange.

11 Q Would -- that would not have been strange, though,
12 if the applications were still pending, would it?

13 A Well, that is true. That is true.

14 Q I'd like you now to refer to page 10 of the exhibit,
15 and there's -- there are references here to six different
16 television stations. These are the Trinity owned and operated
17 stations for which separate solicitations are being made?

18 A Yes, sir.

19 Q Turning to Mass Media Exhibit No. 54.

20 A Yes, sir.

21 Q Again, at the top we have the list of owned and
22 operated stations?

23 A Yes, sir.

24 Q Now, the headline here, "Seattle/Tacoma Station
25 Number Seven." I take it the reference that you are making

1 here is to the full-power station in the Washington -- in
2 Washington State that is going to be Trinity's seventh
3 station?

4 A Yes, sir. That's correct.

5 Q And at this point that's the limit for you?

6 A Yes.

7 Q I'd like you to turn to Mass Media Exhibit No. 55.

8 A Yes, sir. I'm there.

9 Q Now, on the first page, there are nine companies
10 listed and there are individuals named for each of those
11 companies. Are the persons who are listed here supposed to be
12 the Directors of those companies?

13 A I, I believe that is the case, yes, sir.

14 Q Now, in the case of Arizona, number two on the list,
15 your brother Philip, was he the station manager in Arizona at
16 that time?

17 A Yes, sir.

18 Q Moving on to number three, Oklahoma City, is there a
19 person listed there who was the station manager for Oklahoma
20 City?

21 A Yes. Alan Brown was the station manager.

22 Q And he was also a Director?

23 A Yes.

24 Q Now, you'll notice that Jane Duff also appears as a
25 Director, or she's listed there, and from that am I to presume

1 | that she is a Director or is she something else?

2 | A It appears to me that in this case she is a
3 | Director.

4 | Q Moving on to number four, Bernard Ridings, he's a
5 | station manager in Florida?

6 | A Yes.

7 | Q Number five, I notice that Jane Duff is listed. I
8 | take it she's a Director in Indiana?

9 | A That must be the case.

10 | Q Now, is there an individual here who is the station
11 | manager of Indiana?

12 | A Yes. I believe that would have been Charles Quinn.

13 | Q He was also a Director?

14 | A Yes.

15 | Q Number six, New York, Jane Duff appears. I take it
16 | she's a Director?

17 | A Yes, sir.

18 | Q And Grace Cephas, she's a Director?

19 | A Yes.

20 | Q She's the station manager?

21 | A Yes.

22 | Q Number seven, this is your low-power station in
23 | Denver with the great coverage.

24 | A Yes.

25 | Q George Hernandez was absent. I take it he was a

1 Director?

2 A He, he was and remains to this day as one.

3 Q He's the station manager?

4 A No. No.

5 Q The station manager is not a Director here?

6 A No.

7 Q We know about Translator TV, Inc. And I take it
8 number nine, International Panorama TV, Inc., if memory
9 serves, that was just a shell at this time?

10 A Yes.

11 Q Now, moving on to page 2, the very last paragraph on
12 page 2, it says that Translator TV, Inc., showed no income,
13 and I take it that's from the Financial Statement that we have
14 looked at not too long ago. Did any -- do you recall any
15 discussion or conversation about the absence of income from
16 Translator TV, Inc., in light of the solicitations that we saw
17 took place?

18 A I don't recall any, any such discussion, Mr. Shook.
19 You have to remember this was 1983. I think we were right in
20 the middle of the freeze, as far as the Agency was concerned.
21 So, again, the fact that there was no income wasn't too puz-
22 zling. I, I just, I just don't have any independent recollec-
23 tion of that.

24 Q Yeah. No. My, my question isn't so much concerned
25 about whether it's puzzling or not, it was just a matter of

1 whether you could remember there being any discussion about
2 the absence of income and whether any connection was made by
3 any of the Directors that we had solicitations and yet there's
4 no income.

5 A Well, I think we did show a little bit of income,
6 didn't we, on that previous Financial Statement.

7 Q You do recall, though, that that income was from
8 1980?

9 A Yes, that is correct. All I can tell you, Mr.
10 Shook, is that apparently the donors, even though solicita-
11 tions evidently were made through the newsletter at least, and
12 probably on the air as well, it is evident to me that the
13 donors did not sufficiently identify their gift for Translator
14 TV, Inc., clearly enough for the Accounting Department to
15 designate them as TTI income.

16 Q Moving on to page 4, the sixth paragraph beginning
17 with, "Mr. Miller suggested..." Just read that to yourself.

18 A Yes, sir. I've read it.

19 Q Now, was this a policy that was followed from here
20 on forward so far as you know?

21 A Yes, sir. My recollection, memory says that, that
22 this is still pretty much the policy to this day.

23 Q Does this policy have any application outside of the
24 Trinity owned and operated stations so far as you know?

25 A No, sir.

1 Q Would it be your understanding that with respect to
2 National Minority TV, specifically its operations in Portland,
3 that the priorities for purchases of equipment are not priori-
4 tized and then submitted to Mr. Miller for discussion with
5 yourself, you being the President of National Minority?

6 A I, I'm not aware of any such action, although it
7 would not be unusual. Mrs. Duff pretty much defers to Mr.
8 Miller and me, since we're a little more conversant with the
9 engineering aspects, to look over those kinds of things. So,
10 that certainly could happen, but I don't have any independent
11 recollection of it.

12 Q Right. And, and, and with respect to that, you have
13 an engineering background yourself, don't you?

14 A Minimal.

15 Q In other words, if any question came up, you would
16 defer to Mr. Miller?

17 A Indeed.

18 Q Could you please turn to Mass Media Exhibit 56?

19 A Yes, sir. I'm there.

20 Q The list of stations at the top are the owned and
21 operated stations?

22 A Yes, sir.

23 Q Now, this is going to be a little difficult, but
24 one, two, three, four, five, six lines up from the bottom of
25 that first page --

1 A Yes, sir.

2 Q -- where it says, "We need your help as we begin
3 filing..."

4 A I'm sorry. I'm not with you.

5 Q All right. Maybe I'm off a line then. If we --
6 JUDGE CHACHKIN: Sixth line up from the bottom.
7 DR. CROUCH: Yes, sir. I see it.
8 BY MR. SHOOK:

9 Q All right. Now, can you tell me what this is all
10 about?

11 A "We need your help as we begin filing for new non-
12 commercial stations across America." There is no question
13 that I sought to extend the, the reach of Trinity Broadcasting
14 Network by every legitimate means at my disposal. Since we
15 had reached the limit of seven full-power commercial stations,
16 as we just discussed, with Seattle/Tacoma, this was a -- an
17 area that I felt we could explore, at least, to extend at
18 least some of the programming of, of Trinity Broadcasting. I,
19 I knew, of course, that the noncommercial stations had some
20 different programming requirements, and we were certainly
21 prepared to accommodate those distinctions for programming,
22 but this seemed to be at least another way to extend the
23 program affiliation arrangements and agreements with other
24 affiliated corporations.

25 (Off the record.)

1 (On the record.)

2 MR. SHOOK: All right. We're all together again?

3 JUDGE CHACHKIN: Yes.

4 BY MR. SHOOK:

5 Q All right. Dr. Crouch, the reference in the news-
6 letter says April/May 1983. And when you turn to page 4 of
7 this exhibit, which has a page 7 notation at the bottom of it,
8 you'll note that at the top it says Praise-a-thon '82
9 projects.

10 A Well, that's either a misprint or a improper compi-
11 lation of this newsletter has occurred. I, I can't tell you
12 which.

13 Q Well, that's, that's why I want you to turn the
14 page, and on page 8, if you look at the references to the
15 number of stations --

16 A Page 8?

17 Q Which is page -- this is going to be confusing, so
18 bear with me. It's page, it's page 8 of the newsletter copy
19 that I have, but it's page 4 of the Exhibit.

20 A All right, sir. I'm there.

21 Q Now, you notice that there are a number of stations,
22 seven in fact, that are listed here for which separate
23 solicitations are being made.

24 A Yes.

25 Q Do you see that?

1 A Yes.

2 Q And from the last newsletter that we looked at, the
3 contract for Seattle wasn't signed until December of 1982.
4 So, I'm presuming that where it says Praise-a-thon '82 it
5 should read Praise-a-thon '83.

6 A I think you're absolutely correct. That's a
7 misprint.

8 Q Now, once again with respect to pages 5 and 6 of
9 this exhibit, which appear as page 9 and 10 of the newsletter,
10 first to page 5 of the exhibit, the second entry in the right-
11 hand column.

12 A Yes, sir.

13 Q Do you see another solicitation for "Felicidad"?

14 A Yes, sir, I do.

15 Q It would have been the normal practice of yourself
16 to have reviewed this before the newsletter went out?

17 A It would have been the normal practice, yes, sir.

18 Q But you don't have any specific memory of having
19 reviewed this information?

20 A No, sir.

21 Q If you turn the page, sixth page of the exhibit,
22 tenth page of the newsletter, second entry on the right-- on
23 the left, rather.

24 A Yes.

25 Q Low-power stations.